

EXHIBIT C

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS**

Richard Tamez, Billy Tom Medlin,	:	CIVIL ACTION 5:15-cv-330-RP
Gavin Reynolds, and James Clark,	:	
on behalf of themselves and other	:	
similarly situated individuals,	:	
	:	
Plaintiffs,	:	
v.	:	
	:	
BHP Billiton Petroleum (Americas), Inc.	:	
	:	
Defendant.	:	

DECLARATION OF CHARLES CAMPBELL

1. My name is Charles Campbell. I am a Plaintiff in this action against BHP Billiton Petroleum (Americas), Inc. ("Defendant"). I am over the age of eighteen and competent to testify about the matters set forth in this declaration. The statements made in this declaration are made based on my personal knowledge, experiences, and observations.

2. I am an adult resident of the state of Texas.

3. I worked for Defendant as a Fracking Consultant from approximately June 27, 2012 to October 2, 2012 and was classified as an Independent Contractor.

4. While I was classified as an Independent Contractor, Defendant interviewed me for the position, scheduled the days and hours I worked, provided necessary equipment for my job, instructed me on how to perform my duties, and supervised my performance.

5. When working for Defendant, I was paid a day rate for each day I worked. I did not receive any guaranteed amount for weeks I worked.

6. I typically worked 14 days straight and then had 14 days off. On days I worked, I was scheduled for a 12-hour shift, but I regularly worked longer than 12 hours, performing safety inspections and conducting daily safety meetings. I also observed my co-workers working longer than 12-hour shifts.

7. Although I worked overtime hours, I did not receive overtime pay.

8. Based on my personal knowledge, observations, and experiences, I believe that Defendant's failure to pay individuals receiving a day rate any overtime was its standard pay practice, and I have personal knowledge that other Fracking Consultants received a day rate and did not receive any overtime pay.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Dated: 8/19/15


CHARLES CAMPBELL

Richard Tamez, Billy Tom Medlin,	:	CIVIL ACTION 5:15-cv-330-RP
Gavin Reynolds, and James Clark,	:	
on behalf of themselves and other	:	
similarly situated individuals,	:	
	:	
Plaintiffs,	:	
v.	:	
	:	
BHP Billiton Petroleum (Americas), Inc.	:	
	:	
Defendant.	:	

1. My name is Ronnie Carlile. I am a Plaintiff in this action against BHP Billiton Petroleum (Americas), Inc. (“Defendant”). I am over the age of eighteen and competent to testify about the matters set forth in this declaration. The statements made in this declaration are made based on my personal knowledge, experiences, and observations.

3. I worked for Defendant as a Drill Site Manager from approximately September to December 2013 and was classified as an Independent Contractor.

5. When working for Defendant, I was paid a day rate for each day I worked. I did not receive any guaranteed amount for weeks I worked.

6. I typically worked 14 days straight and then had 14 days off. On days I worked, I was scheduled for a 12-hour shift starting, but I regularly worked longer than 12 hours, performing drilling operations on sites and writing rig safety reports. I also observed my co-workers working longer than 12-hour shifts.

7. Although I worked overtime hours, I did not receive overtime pay.

8. Based on my personal knowledge, observations, and experiences, I believe that Defendant's failure to pay individuals receiving a day rate any overtime was its standard pay practice and not limited to my job position. For example, I have personal knowledge that individuals employed as Directional Drillers and Mud Engineers received a day rate and also did not receive any overtime pay.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Dated: 08-07-2015


RONALD CARLILE

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS**

Richard Tamez, Billy Tom Medlin,	:	CIVIL ACTION 5:15-cv-330-RP
Gavin Reynolds, and James Clark,	:	
on behalf of themselves and other	:	
similarly situated individuals,	:	
	:	
Plaintiffs,	:	
v.	:	
	:	
BHP Billiton Petroleum (Americas), Inc.	:	
	:	
Defendant.	:	

DECLARATION OF JAMES CLARK

1. My name is James Clark. I am a Plaintiff in this action against BHP Billiton Petroleum (Americas), Inc. ("Defendant"). I am over the age of eighteen and competent to testify about the matters set forth in this declaration. The statements made in this declaration are made based on my personal knowledge, experiences, and observations.

2. I am an adult resident of the state of Florida.

3. I worked for Defendant as a HSE Specialist from approximately April 2013 to February 2015 and was classified as an Independent Contractor.

4. While I was classified as an Independent Contractor, Defendant interviewed me for the position, scheduled the days and hours I worked, provided necessary equipment for my job, instructed me on how to perform my duties, and supervised my performance.

5. When working for Defendant, I was paid a day rate for each day I worked. I did not receive any guaranteed amount for weeks I worked.

6. I typically worked 14 days straight and then had 14 days off. On days I worked, I was scheduled for a 12-hour shift, but I regularly worked longer than 12 hours, performing my job duties as an HSE Specialist. I also observed my co-workers working longer than the 12-hour shifts.

7. Although I worked overtime hours, I did not receive overtime pay.

8. Based on my personal knowledge, observations, and experiences, I believe that Defendant's failure to pay individuals receiving a day rate any overtime was its standard pay practice and not limited to my job position. For example, I have personal knowledge that individuals employed as Rig Clerks, Site Supervisors, and Superintendents received a day rate and also did not receive any overtime pay.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Dated: 18 Aug 2015


JAMES CLARK

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS**

Richard Tamez, Billy Tom Medlin,	:	CIVIL ACTION 5:15-cv-330-RP
Gavin Reynolds, and James Clark,	:	
on behalf of themselves and other	:	
similarly situated individuals,	:	
	:	
Plaintiffs,	:	
v.	:	
	:	
BHP Billiton Petroleum (Americas), Inc.	:	
	:	
Defendant.	:	

DECLARATION OF CHRISTOPHER GATLIN

1. My name is Christopher Gatlin. I am a Plaintiff in this action against BHP Billiton Petroleum (Americas), Inc. (“Defendant”). I am over the age of eighteen and competent to testify about the matters set forth in this declaration. The statements made in this declaration are made based on my personal knowledge, experiences, and observations.

2. I am an adult resident of the state of Mississippi.

3. I worked for Defendant as a HSE Specialist from approximately March 2013 to December 2014 and was classified as a Independent Contractor.

4. While I was classified as a Independent Contractor, Defendant interviewed me for the position, scheduled the days and hours I worked, provided necessary equipment for my job, instructed me on how to perform my duties, and supervised my performance.

5. When working for Defendant, I was paid a day rate for each day I worked. I did not receive any guaranteed amount for weeks I worked.

6. I typically worked 16 days straight and then had 12 days off. On days I worked, I was scheduled for a 12-hour shift starting, but I regularly worked longer than 12 hours, performing safety meetings, site audits and "hazard hunts" at my location, and training. I also observed my co-workers working longer than the 12-hour shifts.

7. Although I worked overtime hours, I did not receive overtime pay.

8. Based on my personal knowledge, observations, and experiences, I believe that Defendant's failure to pay individuals receiving a day rate any overtime was its standard pay practice and not limited to my job position. For example, I have personal knowledge that individuals employed as drill-site managers and rig clerks received a day rate and also did not receive any overtime pay.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Dated: 8-6-15


CHRISTOPHER GATLIN

6. I typically worked 14 days or more straight and then had 1 or 2 days off. On days I worked, I was scheduled for a 12-hour shift starting, but I regularly worked longer than 12 hours, acting as a liason between engineering departement and construction. I also observed my co-workers working longer than the 12-hour shifts.

7. Although I worked overtime hours, I did not receive overtime pay.

8. Based on my personal knowledge, observations, and experiences, I believe that Defendant's failure to pay individuals receiving a day rate any overtime was its standard pay practice and not limited to my job position. For example, I have personal knowledge that individuals employed as HSE Specialists, Electricians, and Fracking Consultants received a day rate and also did not receive any overtime pay.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Dated: 8-8-15


CLINT GORDON

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS**

Richard Tamez, Billy Tom Medlin,	:	CIVIL ACTION 5:15-cv-330-RP
Gavin Reynolds, and James Clark,	:	
on behalf of themselves and other	:	
similarly situated individuals,	:	
	:	
Plaintiffs,	:	
v.	:	
	:	
BHP Billiton Petroleum (Americas), Inc.	:	
	:	
Defendant.	:	

DECLARATION OF MIKE HALL

1. My name is Mike Hall. I am a Plaintiff in this action against BHP Billiton Petroleum (Americas), Inc. ("Defendant"). I am over the age of eighteen and competent to testify about the matters set forth in this declaration. The statements made in this declaration are made based on my personal knowledge, experiences, and observations.

2. I am an adult resident of the state of Texas.

3. I worked for Defendant as a Facilities Inspector from approximately July 21, 2014 to November 23, 2014 and was classified as an Independent Contractor .

4. While I was classified as an Independent Contractor, Defendant interviewed me for the position, scheduled the days and hours I worked, provided necessary equipment for my job, instructed me on how to perform my duties, and supervised my performance.

5. When working for Defendant, I was paid a day rate for each day I worked. I did not receive any guaranteed amount for weeks I worked.

hours, performing the permit approval process, ensuring the work was up to code, and taking inventory of materials. I also observed my co-workers working longer than the 12-hour shifts.

7. Although I worked overtime hours, I did not receive overtime pay.

8. Based on my personal knowledge, observations, and experiences, I believe that Defendant's failure to pay individuals receiving a day rate any overtime was its standard pay practice and not limited to my job position. For example, I have personal knowledge that individuals employed in the Quality Assurance and Quality Control Department received a day rate and also did not receive any overtime pay.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Dated: 8-11-2015

Michael R. Hall
MIKE HALL

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS**

Richard Tamez, Billy Tom Medlin,	:	CIVIL ACTION 5:15-cv-330-RP
Gavin Reynolds, and James Clark,	:	
on behalf of themselves and other	:	
similarly situated individuals,	:	
	:	
Plaintiffs,	:	
v.	:	
	:	
BHP Billiton Petroleum (Americas), Inc.	:	
	:	
Defendant.	:	

DECLARATION OF BILLY MEDLIN

1. My name is Billy Medlin. I am a Plaintiff in this action against BHP Billiton Petroleum (Americas), Inc. ("Defendant"). I am over the age of eighteen and competent to testify about the matters set forth in this declaration. The statements made in this declaration are made based on my personal knowledge, experiences, and observations.

2. I am an adult resident of the state of Texas.

3. I worked for Defendant as a HSE Specialist from approximately December 2012 to March 2015 and was classified as an Independent Contractor.

4. While I was classified as a Independent Contractor, Defendant interviewed me for the position, scheduled the days and hours I worked, provided necessary equipment for my job, instructed me on how to perform my duties, and supervised my performance.

5. When working for Defendant, I was paid a day rate for each day I worked. I did not receive any guaranteed amount for weeks I worked.

6. I typically worked 21 days straight and then had 5 days off. On days I worked, I was scheduled for a 12-hour shift starting, but I regularly worked longer than 12 hours, performing safety inspections on oil rigs, training sessions for oil workers and responding to safety incidents. I also observed my co-workers working longer than the 12-hour shifts.

7. Although I worked overtime hours, I did not receive overtime pay.

8. Based on my personal knowledge, observations, and experiences, I believe that Defendant's failure to pay individuals receiving a day rate any overtime was its standard pay practice and not limited to my job position. For example, I have personal knowledge that individuals employed as drill site managers received a day rate and also did not receive any overtime pay.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Dated:

8/2/15


BILLY MEDLIN

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS**

Richard Tamez, Billy Tom Medlin,	:	CIVIL ACTION 5:15-cv-330-RP
Gavin Reynolds, and James Clark,	:	
on behalf of themselves and other	:	
similarly situated individuals,	:	
	:	
Plaintiffs,	:	
v.	:	
	:	
BHP Billiton Petroleum (Americas), Inc.	:	
	:	
Defendant.	:	

DECLARATION OF ROBERT NESLONEY JR.

1. My name is Robert Nesloney Jr. I am a Plaintiff in this action against BHP Billiton Petroleum (Americas), Inc. ("Defendant"). I am over the age of eighteen and competent to testify about the matters set forth in this declaration. The statements made in this declaration are made based on my personal knowledge, experiences, and observations.

2. I am an adult resident of the state of Texas.

3. I worked for Defendant as a Site Consultant from approximately March 2014 to December 2014 and was classified as an Independent Contractor.

4. While I was classified as an Independent Contractor, Defendant interviewed me for the position, scheduled the days and hours I worked, provided necessary equipment for my job, instructed me on how to perform my duties, and supervised my performance.

5. When working for Defendant, I was paid a day rate for each day I worked. I did not receive any guaranteed amount for weeks I worked.

6. I typically worked 21 days straight and then had 1 or 2 days off. On days I worked, I was scheduled for a 12-hour shift starting, but I regularly worked longer than 12 hours, performing facility management and overseeing construction activities. I also observed my co-workers working longer than the 12-hour shifts.

7. Although I worked overtime hours, I did not receive overtime pay.

8. Based on my personal knowledge, observations, and experiences, I believe that Defendant's failure to pay individuals receiving a day rate any overtime was its standard pay practice and not limited to my job position. For example, I have personal knowledge that individuals employed as completion consultants, drilling supervisors, rig supervisors, and construction consultants received a day rate and also did not receive any overtime pay.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Dated: 8-5-2015


ROBERT NESLONEY JR.

6. I typically worked 15 days straight and then had 13 days off. On days I worked, I was scheduled for a 12-hour shift starting, but I regularly worked longer than 12 hours, performing safety audits, conducting staff observations, leading safety meetings, and writing daily reports. I also observed my co-workers working longer than the 12-hour shifts.

7. Although I worked overtime hours, I did not receive overtime pay.

8. Based on my personal knowledge, observations, and experiences, I believe that Defendant's failure to pay individuals receiving a day rate any overtime was its standard pay practice and not limited to my job position. For example, I have personal knowledge that individuals employed as Drill Site Managers, Directional Drillers, and Rig Clerks received a day rate and also did not receive any overtime pay.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Dated: _____


MERLIN PRICE

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS**

Richard Tamez, Billy Tom Medlin,
Gavin Reynolds, and James Clark,
on behalf of themselves and other
similarly situated individuals,

Plaintiffs,

v.

BHP Billiton Petroleum (Americas), Inc.

Defendant.

CIVIL ACTION 5:15-cv-330-RP

DECLARATION OF GAVIN REYNOLDS

1. My name is Gavin Reynolds. I am a Plaintiff in this action against BHP Billiton Petroleum (Americas), Inc. ("Defendant"). I am over the age of eighteen and competent to testify about the matters set forth in this declaration. The statements made in this declaration are made based on my personal knowledge, experiences, and observations.
2. I am an adult resident of the state of Minnesota.
3. I worked for Defendant as an HSE Specialist from approximately May 2013 to August 2014 and was classified as a Consultant.
4. While I was classified as a Consultant, Defendant interviewed me for the position, scheduled the days and hours I worked, provided necessary equipment for my job, instructed me on how to perform my duties, and supervised my performance.
5. When working for Defendant, I was paid a day rate for each day I worked. I did not receive any guaranteed amount for weeks I worked.


6 I typically worked 14 days straight and then had 14 days off. On days I worked, I was scheduled for a 12-hour shift, but I regularly worked longer than 12 hours, performing audits of safety management systems and advising site-supervisors on health, safety and environment issues. I also observed my co-workers working longer than the 12-hour shifts.

7 Although I worked overtime hours, I did not receive overtime pay.

8 Based on my personal knowledge, observations, and experiences, I believe that Defendant's failure to pay individuals receiving a day rate any overtime was its standard pay practice and not limited to my job position. For example, I have personal knowledge that individuals employed as Completion Consultants and Rig Clerks received a day rate and also did not receive any overtime pay.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Dated: 14 Aug 2015


GAVIN REYNOLDS

5. While I was classified as an employee, my duties did not change from when I was an Independent Contractor.

6. When working for Defendant, I was paid a day rate for each day I worked. I did not receive any guaranteed amount for weeks I worked.

7. I typically worked 14 days straight and then had 14 days off. Occasionally, I worked 21 days straight. On days I worked, I was scheduled for a 12-hour shift, but I regularly worked longer than 12 hours, performing audits of oil drilling sites and accident investigations at various locations. I also observed my co-workers working longer than 12-hour shifts.

8. Although I worked overtime hours, I did not receive overtime pay.

9. Based on my personal knowledge, observations, and experiences, I believe that Defendant's failure to pay individuals receiving a day rate any overtime was its standard pay practice and not limited to my job position. For example, I have personal knowledge that individuals employed as Company men, Well-site Supervisors, and Completion Supervisors received a day rate and also did not receive any overtime pay.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Dated: 8-4-2015


PORFIRIO RINCONES

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS**

Richard Tamez, Billy Tom Medlin,	:	CIVIL ACTION 5:15-cv-330-RP
Gavin Reynolds, and James Clark,	:	
on behalf of themselves and other	:	
similarly situated individuals,	:	
	:	
Plaintiffs,	:	
v.	:	
	:	
BHP Billiton Petroleum (Americas), Inc.	:	
	:	
Defendant.	:	

DECLARATION OF JEFFERY SAVOY

1. My name is Jeffery Savoy. I am a Plaintiff in this action against BHP Billiton Petroleum (Americas), Inc. ("Defendant"). I am over the age of eighteen and competent to testify about the matters set forth in this declaration. The statements made in this declaration are made based on my personal knowledge, experiences, and observations.

2. I am an adult resident of the state of Oklahoma.

3. I worked for Defendant as a Drilling Consultant from approximately January 2012 to October 2013 and was classified as an Independent Contractor.

4. While I was classified as an Independent Contractor, Defendant scheduled the days and hours I worked, provided necessary equipment for my job, instructed me on how to perform my duties, and supervised my performance.

5. When working for Defendant, I was paid a day rate for each day I worked. I did not receive any guaranteed amount for weeks I worked.

6. I typically worked 14 days straight and then had 14 days off. On days I worked, I was scheduled for a 12-hour shift, but I regularly worked longer than 12 hours, managing daily safety meetings and overseeing operations at various oil rigs. I also observed my co-workers working longer than the 12-hour shifts.

7. Although I worked overtime hours, I did not receive overtime pay.

8. Based on my personal knowledge, observations, and experiences, I believe that Defendant's failure to pay individuals receiving a day rate any overtime was its standard pay practice and not limited to my job position. For example, I have personal knowledge that individuals employed as Company men, Superintendents, and HSE Specialists received a day rate and also did not receive any overtime pay.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Dated: 8-18-15


JEFFERY SAVOY

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS**

Richard Tamez, Billy Tom Medlin,	:	CIVIL ACTION 5:15-cv-330-RP
Gavin Reynolds, and James Clark,	:	
on behalf of themselves and other	:	
similarly situated individuals,	:	
	:	
Plaintiffs,	:	
v.	:	
	:	
BHP Billiton Petroleum (Americas), Inc.	:	
	:	
Defendant.	:	

DECLARATION OF RICHARD TAMEZ

1. My name is Richard Tamez. I am a Plaintiff in this action against BHP Billiton Petroleum (Americas), Inc. ("Defendant"). I am over the age of eighteen and competent to testify about the matters set forth in this declaration. The statements made in this declaration are made based on my personal knowledge, experiences, and observations.

2. I am an adult resident of the state of Texas.

3. I worked for Defendant as a Safety Coordinator from approximately April 2014 to January 2015 and was classified as an Independent Contractor.

4. While I was classified as an Independent Contractor, Defendant interviewed me for the position, scheduled the days and hours I worked, provided necessary equipment for my job, instructed me on how to perform my duties, and supervised my performance.

5. When working for Defendant, I was paid a day rate for each day I worked. I did not receive any guaranteed amount for weeks I worked.

6. I typically worked 14 days straight then had 14 days off or worked 21 days straight then had 7 days off. On days I worked, I was scheduled for a 12-hour shift, but I regularly worked longer than 12 hours, performing safety audits at various sites, conducting safety meetings, and reporting safety violations. I also observed my co-workers working longer than the 12-hour shifts.

7. Although I worked overtime hours, I did not receive overtime pay.

8. Based on my personal knowledge, observations, and experiences, I believe that Defendant's failure to pay individuals receiving a day rate any overtime was its standard pay practice and not limited to my job position. For example, I have personal knowledge that individuals employed as Site Supervisors received a day rate and also did not receive any overtime pay.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Dated: 8/12/2015


RICHARD TAMEZ